



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

John M. Robinson, Treasurer  
Senate Victory Fund PAC  
(FKA Cochran Committee)  
P.O. Box 7274  
Tupelo, MS 38802

SEP 23 1998

Identification Number: C00202861

Reference: Mid-Year (1/1/97-6/30/97), April Quarterly (1/1/98-3/31/98) and  
Amended July Quarterly (4/1/98-6/30/98), dated 7/27/98 Reports

Dear Mr. Robinson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrew Dodson". The signature is fluid and cursive, with the first name "Andrew" written in a larger, more prominent script than the last name "Dodson".

Andrew J. Dodson  
Senior Reports Analyst  
Reports Analysis Division